

## REMARKS

Claims 20-23, 27, 31-32 are amended to clarify the subject matter of the specification area, and claims 33-34 are added. Support for the amendments is found in the specification. No new matter is added. In view of the above amendments and following remarks, reconsideration of this application is respectfully requested.

The Office Action asserts that the May 11, 2005 filed IDS fails to comply with 37 CFR 1.98(a)(2). Applicants enclose the English abstracts of the respective IDS submissions. Accordingly, Applicants respectfully submit that any deficiency in the IDS is now cured and, therefore, request reconsideration of the May 11, 2005 filed IDS.

The Office Action rejects claims 20-32 under 35 U.S.C. 102(b) over Iguchi et al. (U.S. Patent application Publication 2002/0169960). This rejection is respectfully traversed.

The test for anticipation under section 102 is whether each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987); MPEP §2131. The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989); MPEP §2131. The elements must also be arranged as required by the claim. *In re Bond*, 15 USPQ2d 1566 (Fed. Cir. 1990).

The present invention relates to an access method for an apparatus to gain access to a specific area in a memory device (for example, a memory card), and is directed to (1) first, transmitting “designation information” from the apparatus to the memory device, (2) second, transmitting “verification information” generated using this “designation information” and “a processing command” (for example, a command for reading out or writing data), to the memory device, (3) verifying “verification information” using “designation information” in the memory device and (4), when this verification succeeds, executing “the processing command” in the memory device.

That is, by transmitting information including a command from the apparatus to the memory device in two steps, it is not necessary to change a command format as

required when designation information and verification information are included in a command argument of a memory command (see page 4, line 13 to page 5, line 13 of the Specification). This enables access to a security protection area in the memory device without decreasing security.

In contrast, Iguchi discloses that when data is recorded in the storage device, such as an IC card including a tamper resistant module, a separate destination for storage destination of high-security data and low-security data is required. However, Iguchi does not disclose or suggest transmitting information including a command for reading out or writing data in two steps.

The Office Action cites Iguchi's "content access request includes address and size" against "designation information" of the Applicants' claim 1. Applicants respectfully disagree. Specifically, this "content access request" is directed to requesting a server by a recording apparatus (inside the IC card) to deliver content and is not directed to accessing data in the recording apparatus. That is, Iguchi's "content access request" is transmitted from the memory device to an external apparatus (here, the server), and is not transmitted from the external apparatus to the memory device. Accordingly, this "content access request" by Iguchi is completely different from the "designation information" recited in the Applicants' claims.

Further, the Office Action asserts that Iguchi's "verify request" is analogous to the "verification information" recited in Applicants' claims. However, regarding the "verify request," Iguchi only discloses that "VERIFY 1602 is a command by which the decoder circuit 206 issues a certification code for starting up the applications inside the storage device 120." Further, Iguchi discloses that this "verify request" is a command transmitted from a mobile phone to a storage device (IC card) but does not disclose or teach how this "verify request" is generated. Additionally, Iguchi does not provide disclosure equivalent to "designation information", and so Iguchi's "verify request" is different from the "verification information generated based on the designation information" as recited in Applicants' claims.

The present invention is capable of transmitting "verification information generated based on the designation information" from the apparatus to the memory device, and, consequently, is able to verify "verification information" using "designation information" previously transmitted, so that the present invention provides the advantage of enabling access to the security protection areas without decreasing security. Iguchi discloses no such mechanism.

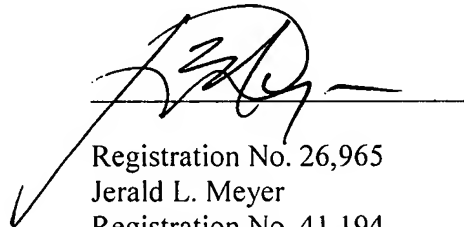
Therefore, in view of the above, Iguchi does not disclose or suggest all the features recited in Applicants' independent claims 20-23, 27, 31-32. Since claims 24-26 depend from claim 23; claims 28-30 depend from claim 27; and claims 33-34 depend from claim 20, Applicants respectfully request the withdrawal of this rejection.

#### CONCLUSION

In light of the foregoing, Applicants submit that the application is in condition for allowance. If the Examiner believes the application is not in condition for allowance, Applicants respectfully request that the Examiner call the undersigned.

Respectfully submitted,  
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